

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Petition of Massachusetts Electric Company and Nantucket)	
Electric Company for approval of a Rate Reconciliation)	D.T.E. 03-126
and Adjustment filing)	
)	

**ATTORNEY GENERAL'S FIRST SET OF
DOCUMENT AND INFORMATION REQUESTS**

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Massachusetts Electric Company and Nantucket Electric Company or to any individual or entity sponsoring testimony or retained by the Companies to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information Requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide two copies of each response.
16. The terms “Company” or “Companies” refer to Massachusetts Electric Company and Nantucket Electric Company. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

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DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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**ATTORNEY GENERAL'S FIRST SET OF
DOCUMENT AND INFORMATION REQUESTS**

The following is the Attorney General's First Set of Document and Information Requests in the above referenced docket.

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| <p>AG-1-1</p> | <p>In connection with the "disputed" uplift costs and expenses initially discussed in docket, DTE 01-102, please provide the total amount of "disputed" uplift expenses that the Company has incurred through September 30, 2003. Include copies of invoices supporting the expense.</p> |
| <p>AG-1-2</p> | <p>Please provide a monthly tabulation of the "disputed" uplift expense and the corresponding amount recovered from the Company's customers through September 30, 2003.</p> |
| <p>AG-1-3</p> | <p>Please state whether the Company is still incurring the "disputed" uplift costs and explain how the Company intends to collect or recover these costs. Specify the rate element(s).</p> |
| <p>AG-1-4</p> | <p>Please state whether any of the "disputed" uplift costs are included in the exogenous costs that the Company seeks to recover in docket, DTE 03-124, or included in the costs in the Company's filing in the default service unbundling docket, DTE 03-88.</p> |
| <p>AG-1-5</p> | <p>Please provide a status report on the Company's dispute resolution proceedings with the Standard Offer Service suppliers regarding uplift cost responsibility. Provide copies of all documents submitted or issued in these proceedings together with copies of any agreements or settlements reached and any decisions rendered.</p> |

State whether any decisions rendered in these proceedings may be appealed and whether the Company has or will appeal any decisions rendered in these proceedings.

- AG-1-6 Please state whether any of the rates in this filing include costs that the Company seeks to recover in either DTE 03-124 (Exogenous Costs) or DTE 03-88 (Default Costs)? If so, please provide each item along with the associated rate element(s) that it is being recovered in, and the amount(s). Also explain why the Company has requested these amounts in multiple filings, and the Company's plans for implementing any amounts granted.
- AG-1-7 Please provide all assumptions, backup, source documents and workpapers for the calculations supporting the Company's Supplemental Filing, Suppl. Exh. TMB-2, Page 1 of 2, Line 4 (Forecast 2004 kWh sales). Please provide the forecast on a monthly basis. Please provide a monthly forecast of customers on the same basis.
- AG-1-8 Please provide the Company's monthly billed revenue, number of customers, and kWh by service classification (rate class). Show each service classification by energy supply (default, standard offer, competitive). Please provide this data for 2001, 2002 and 2003.
- AG-1-9 Please provide a detailed explanation for the supplier reallocations in the Company's Filing, Exh. TMB-2, Page 3 of 3. Provide all supporting documents, workpapers and calculations.
- AG-1-10 Please provide an exhibit formatted in the manner found in the Company's Filing, Exh. TMB-2, using data for the prior period (Oct-01 to Oct-02).
- AG-1-11 Please provide all assumptions, backup, source documents and workpapers for the calculations supporting the Company's Supplemental Filing, Suppl. Exh. TMB-2, Page 1 of 2, Line 4 (Forecast 2004 kWh sales). Please provide the forecast on a monthly basis. Please provide a monthly forecast of customers on the same basis.
- AG-1-12 Please provide a copy of Exhibit PTZ-1, Revised, that is referenced in the Company's Supplemental Filing, Suppl. Exh. TMB-3, Page 1 of 7, Footnote (a).
- AG-1-13 Please provide all assumptions, backup, source documents and workpapers for the calculations supporting the Company's Supplemental Filing, Suppl. Exh. TMB-3, Pages 3, 4, 5, 6, and 7 of 7, Section 2, Total Units (all items, all rate classes).
- AG-1-14 Please provide all assumptions, backup, source documents and workpapers for the calculations supporting the Company's Filing, Exh. TMB-4, Page 1 of 3, Footnotes (1) and (4).

AG-1-15 Refer to the Company's Supplemental Filing, page 3 of 9, line 17. Please explain the reason for the \$57.2 million under collection and provide supporting documentation. If there are multiple causes for the under collection, please describe each and provide the individual amounts attributable to each cause. Explain whether any of the under collection is related to congestion/uplift, the fuel adjustment clause, or any amounts under dispute? If so, please describe each dispute, the associated amount(s), the action being taken to resolve the dispute and provide an estimate of when the dispute may be resolved.

Dated: February 23, 2004